# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

TYRONE CADE,	§	
Petitioner,	§	
	§	
v.	§	
	§	CIVIL NO. 3:17-CV-03396-G
LORIE DAVIS, Director,	§	(Death Penalty Case)
Texas Department of Criminal	§	
Justice, Correctional Institutions	§	
Division,	§	
Respondent.	§	

## RESPONDENT'S UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

This is a federal habeas corpus proceeding initiated by Petitioner Tyrone Cade, a death-sentenced Texas inmate, pursuant to 28 U.S.C. § 2254. This case has recently been reassigned to the undersigned counsel. Accordingly, the Director respectfully requests that former Assistant Attorney General Ali M. Nasser be withdrawn and removed as counsel of record for the Respondent, and Assistant Attorney General Cara Hanna be substituted thereof, as well as replace Assistant Attorney General Stephen Hoffman as lead counsel. As reflected in the certificate of conference, Cade's counsel is unopposed. Any future documents should be sent to the same address (if physically delivered) or to the undersigned's email address (if electronic).

### CONCLUSION

The Director respectfully requests that the Court allow Ali M. Nasser to withdraw as counsel and substitute Cara Hanna as lead counsel of record for the Director.

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER First Assistant Attorney General

MARK PENLEY
Deputy Attorney General
For Criminal Justice

EDWARD L. MARSHALL Chief, Criminal Appeals Division

s/ Cara Hanna

CARA HANNA\*

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Counsel for Respondent

#### CERTIFICATE OF CONFERENCE

Counsel for Cade indicated that they are not opposed to this substitution.

s/ Cara Hanna CARA HANNA Assistant Attorney General

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\*Lead Counsel

### CERTIFICATE OF SERVICE

I hereby certify that, on June 10, 2020, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to counsel, who has consented in writing to accept this Notice as service of this document by electronic means:

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s/ Cara Hanna CARA HANNA Assistant Attorney General